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REMARKS/DISCUSSION OF ISSUES

In the Non-Final Office Action, Examiner Wu rejected pending claims 1, 4-10 and 12-20 on various grounds. The Applicant responds to each rejection as subsequently recited herein, and respectfully requests reconsideration and further examination of the present application under 37 CFR § 1.112:

- A. Examiner Wu rejected claims 12 and 17 under 35 U.S.C. § 112, ¶1 as failing to comply with the written description requirement.

The Applicant has cancelled claims 12 and 17 herein. Withdrawal of the rejection of claims 12 and 17 under 35 U.S.C. § 112, ¶1 is therefore respectfully requested.

- B. Examiner Wu rejected claims 1, 4-10, 13-16, and 18-20 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,518,962 to *Kimura et al.* in view of U.S. Patent No. 6,549,179 to *Youngquist et al.*

The Applicant has thoroughly considered Examiner Wu's remarks concerning the patentability of claims 1, 4-10, 13-16 and 18-20 over *Kimura* in view of *Youngquist*. The Applicant has also thoroughly read *Kimura* and *Youngquist*. To warrant this obviousness rejection of claims 1, 4-10, 13-16 and 18-20, all the claim limitations recited in independent claims 1, 9 and 15 must be taught or suggested by the combination of *Kimura* and *Youngquist*. See, MPEP § 2143. The Applicant respectfully traverses this obviousness rejection of claims 1, 4-10, 13-16 and 18-20, because *Kimura* and *Youngquist* fails to teach or suggest the following limitations of independent claims 1, 9 and 15:

1. "characterized in that the correction means comprise at least one reference photosensor for detecting the ambient radiation; wherein the at least one reference photosensor is shielded from the emitted radiation" as recited in independent claim 1;

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2. "at least one reference photosensor optically shielded from the emitted radiation for detecting ambient radiation" as recited in independent claim 9;
and
3. "at least one reference photosensor arranged for detecting ambient radiation without detecting radiation emitted by the electroluminescent pixels"
as recited in independent claim 15.

As to the traversal, Examiner Wu correctly recognized the failure of *Kimura* to teach or suggest the aforementioned limitations of independent claims 1, 9 and 15. A careful review of *Youngquist* reveals that *Youngquist* also fails to teach or suggest the aforementioned limitations of independent claims 1, 9 and 15.

Specifically, as illustrated in FIGS. 2 and 3, *Youngquist* discloses an aperture 24 in a printed circuit board 22 for a photosensor that is used to sense ambient light levels and thus provide feedback control to a desired brightness level for the display in daylight time and a desired brightness level for the display at night time. See, *Youngquist* at column 3, lines 54-60, and column 4, lines 33-36. Examiner Wu asserts that aperture 24 shields the photosensor from radiation emitted from LEDs 20 despite the fact that *Youngquist* never, positively or negatively, states whether aperture 24 shields the photosensor from radiation emitted from LEDs 20.

However, from FIGS. 1-3, it is unequivocally clear that radiation emitted among the LEDs 20 adjacent aperture 24 may follow a downward path from such adjacent LEDs 20 to the opening of aperture 24 where the emitted radiation is downwardly reflected within aperture 24 to photosensor. This scenario is just as plausible as the assertion by Examiner Wu that aperture 24 shields the photosensor from radiation emitted from LEDs 20, because *Youngquist* neither (1) teaches or suggest a particular distance that must be maintained between the adjacent LEDs 20 and aperture 24 to shield the photosensor from radiation emitted from the adjacent LEDs 20, nor (2) teaches or suggests a particular radiation scheme for the radiation emitted from the adjacent LEDs 20 to ensure the emitted radiation does not propagate into aperture 24. Consequently, *Youngquist* can not be interpreted as teaching or suggesting the aforementioned limitations of independent claims 1, 9 and 15.

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Withdrawal of the rejection of independent claims 1, 9 and 15 under 35 U.S.C. §103(a) as being unpatentable over *Kimura* in view of *Youngquist* is therefore respectfully requested.

Claims 4-8 depend from independent claim 1. Therefore, dependent claims 4-8 include all of the elements and limitations of independent claim 1. It is therefore respectfully submitted by the Applicant that dependent claims 4-8 are allowable over *Kimura* in view of *Youngquist* for at least the same reason as set forth herein with respect to independent claim 1 being allowable over *Kimura* in view of *Youngquist*. Withdrawal of the rejection of dependent claims 4-8 under 35 U.S.C. §103(a) as being unpatentable over *Kimura* in view of *Youngquist* is therefore respectfully requested.

Claims 10, 13 and 14 depend from independent claim 9. Therefore, dependent claims 10, 13 and 14 include all of the elements and limitations of independent claim 9. It is therefore respectfully submitted by the Applicant that dependent claims 10, 13 and 14 are allowable over *Kimura* in view of *Youngquist* for at least the same reason as set forth herein with respect to independent claim 9 being allowable over *Kimura* in view of *Youngquist*. Withdrawal of the rejection of dependent claims 10, 13 and 14 under 35 U.S.C. §103(a) as being unpatentable over *Kimura* in view of *Youngquist* is therefore respectfully requested.

Claims 16 and 18-20 depend from independent claim 15. Therefore, dependent claims 16 and 18-20 include all of the elements and limitations of independent claim 15. It is therefore respectfully submitted by the Applicant that dependent claims 16 and 18-20 are allowable over *Kimura* in view of *Youngquist* for at least the same reason as set forth herein with respect to independent claim 15 being allowable over *Kimura* in view of *Youngquist*. Withdrawal of the rejection of dependent claims 16 and 18-20 under 35 U.S.C. §103(a) as being unpatentable over *Kimura* in view of *Youngquist* is therefore respectfully requested.

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SUMMARY

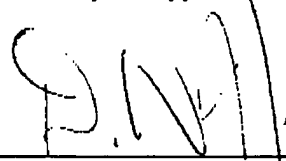
Examiner Wu's written description rejection of claims 12 and 17 has been obviated by the cancellation of claims 12 and 17 herein. Examiner Wu's obviousness rejection of claims 1, 4-10, 13-16 and 18-20 has been obviated by remarks herein supporting allowance of claims 1, 4-10, 13-16 and 18-20 over *Kimura* in view of *Youngquist*. The Applicant respectfully submits that claims 1, 4-10, 13-16, and 18-20 as listed herein fully satisfy the requirements of 35 U.S.C. §§ 102, 103 and 112. In view of the foregoing, favorable consideration and early passage to issue of the present application is respectfully requested. If any points remain in issue that may best be resolved through a personal or telephonic interview, Examiner Wu is respectfully requested to contact the undersigned at the telephone number listed below.

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Respectfully submitted,
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